

January 7, 2021

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Via email to: pointreyesmanagementplan@coastal.ca.gov

Re: **Object** to Agenda Item CD-0006-20 National Park Service Federal Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment

Dear Commissioners:

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

For nine years, we have conducted intensive research on river otter populations within Point Reyes National Seashore (PRNS). Consistent with National Park Service (NPS) Management Policy 4.2, our “studies support the NPS mission by providing the Service, the scientific community, and the public with an understanding of park resources, processes, values, and uses that will be cumulative and constantly refined.” Our work also supports the Coastal Commission’s commitment to rigorous use of science and strong public participation as embodied by Coastal Act Sections 30006 and 30006.5, your mission statement, and the recently adopted 2021-2025 Strategic Plan.

Our research entails field study in PRNS at least once a week at up to 10 different sites, and we have had abundant opportunity to observe and document changes and conditions that affect the natural resources and visitor experience in the Seashore. The following comments reflect our organizational mission; our understanding of laws and policies relevant to management of California’s Coastal Zone generally and PRNS in particular; and our dual role as scientists working to understand the

ecosystem function of the park's natural resources, and as members of the public on whose behalf these lands and waters have been entrusted to the care of the National Park Service, subject to the provisions of the Coastal Zone Management Act.

We strongly urge you to object to the NPS Federal Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment (GMPA). The GMPA would result in continuing and increasing degradation of water quality and the marine environment in California's Coastal Zone, and is not consistent to the maximum extent practicable with the California Coastal Management Program.

The entire consistency determination process has been rushed in order to meet an arbitrary deadline set by the outgoing Trump administration. Commission staff has already determined that the GMPA will result in impairments to water quality and marine resources, but has not had adequate time to perform a complete analysis of the GMPA. The documented negative effects of beef and dairy ranching on water quality and the marine environment, including Drakes Estero and Abbotts Lagoon, need to be more fully explored and addressed by necessary mitigation measures, and a water quality improvement plan, that are finalized before the Commission makes a decision on the GMPA.

Many of the mitigation measures included in the GMPA are inadequate, too vague, or lack a specific timeframe for implementation. As one example, the GMPA allows 20-year ranching leases to be issued immediately, but mitigations such as fencing-off sensitive habitat areas may occur at some unspecified time in the future. As another example, the GMPA allows mowing for silage to occur during the bird nesting season, which will result in the deaths of many ground-nesting birds. No funding sources are identified for many of the mitigation measure, and NPS staff at Point Reyes does not have adequate resources for ensuring enforcement of lease provisions.

Without further analysis based on more specific information, the Coastal Commission cannot adequately determine whether the GMPA would protect California's coastal resources. Based on the information currently available, it would not. Moreover, the public has not had sufficient time to analyze and understand the effectiveness of staff's proposal for Conditional Concurrence. Considering that the GMPA will guide management of some of California's most valuable coastal resources for the next 20 years, more time for analysis and public participation is certainly warranted.

Please object to the consistency determination until NPS cooperatively works with Commission staff to ensure the protection of California's coast now and for future generations.

Thank you for your thoughtful attention to this very important issue.

Respectfully,

A handwritten signature in cursive script that reads "Megan Isadore". The signature is written in a dark ink and is positioned below the word "Respectfully,".

Megan Isadore
Executive Director